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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SHADEESHA BROWN and
GABRIEL PEREZ,

Plaintiffs,

v.

THE CITY OF NEW YORK, BRIAN McALEAR,
KEITH HOCKADAY, FREDERICO MARTINEZ,
JOAQUIN MORALES, ROBERT DOWNES,
THOMAS ALBANO, GERARD FLOOD,
WILLIAM HART, TIMOTHY MURPHY,
KENYATTA ROUSE, and THOMAS LONGA,

Defendants.

11 CV 1068 (AJN)

Notice of Motion

PLEASE TAKE NOTICE THAT, pursuant to Rule 56 of the Federal Rules of Civil Procedure and Rule 56.1 of the Local Rules of the Southern and Eastern Districts of New York, defendants the City of New York, Brian McAlear, Keith Hockaday, Frederico Martinez, Joaquin Morales, Robert Downes, Thomas Albano, Gerard Flood, William Hart, Thomas Murphy, Kenyatta Rouse, and Thomas Longa (together "Defendants"), by and through their undersigned counsel, will move this Court, before the Honorable Alison J. Nathan, United States District Judge, 500 Pearl Street, New York, New York 10027, for an Order granting Defendants'

Motion for Summary Judgment against Plaintiffs Shadeesha Brown and Gabriel Perez on their causes of action pursuant to 42 U.S.C. § 1983 for constitutional violations under the Fourth, Fifth, Ninth, and Fourteenth Amendments to the United States Constitution, and for false imprisonment, assault and battery, and for extreme emotional distress.

Defendants' motion is based on this notice, their concurrently filed Statement of Undisputed Facts Pursuant to Local Rule 56.1, Memorandum of Law in Support of Defendants' Motion for Summary Judgment, the accompanying Declaration of Martin S. Bloor, and the exhibits attached thereto.

Wherefore, Defendants request that, for the reasons set forth in the accompanying Memorandum of Law, the Court enter an order granting summary judgment in favor of Defendants.

Dated: New York, New York
July 5, 2012

Respectfully submitted,

Linklaters LLP

By: /s/ Martin S. Bloor
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